January 28, 2011

Mr. Bob Wyatt
Northwest Natural & Chairman, Lower Willamette Group
220 Northwest Second Avenue
Portland, OR 97209

Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial
        Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240
        Portland Harbor Feasibility Study

Dear Mr. Wyatt:

        The purpose of this letter is provide EPA's comments on the four FS check-in
presentations provided by the LWG at our December 14, 2010 meeting. EPA previously
provided our initial observations and feedback on some of the information that was presented at
the check-in meeting in our December 21, 2010 letter.

        As noted in our December 21, 2010 letter, the information presented at the December 14,
2010 FS check-in meeting was a subset of the information that EPA and the LWG had
previously agreed would be provided at meeting. The presentations covered some of the FS
tools that are being used in the alternatives screening effort, including preliminary capping
chemical isolation evaluation, preliminary methods for volume determinations, disposal site
screening evaluation, and Preliminary Remediation Goal (PRG) and Sediment Management Area
(SMA) mapping uncertainty analyses.   While EPA found the presentations on capping, disposal
site screening and volume determinations useful, it was difficult to provide detailed and
comprehensive comments on those FS tools without an understanding of how the other FS tools
that were not presented are being used, or the results and conclusions of the alternatives
screening analysis.

        The following summarizes some our general comments on the material presented at the
meeting:

- The LWG should not eliminate capping over broad areas or for low level contamination,
  and EPA expects that a more appropriate screening level analysis would lead to that
  conclusion.

- The LWG should not eliminate dredging around structures or demolition of structures as
  an option at the screening stage. These should be case-by-case evaluations performed in
  the detailed analysis of alternatives and/or remedial design.

- The LWG needs to provide information to support the assumptions and conclusions regarding disposal capacity at Ross Island. EPA is uncertain about whether this disposal option should be carried through to the detailed evaluation of alternatives based on the information that was presented.

- EPA also noted in our previous correspondence that we are very concerned about the quantitative sensitivity analysis that the LWG is currently envisioning as part of its risk management process. The December 14th meeting presentation provided very little detail on this analysis, so we are providing only a few general comments on this topic. EPA's position is that including the analysis as part of the FS screening process is unnecessary, and that schedule delays associated with such analysis are unacceptable.

EPA's comments on the four topics that were presented at the meeting are attached. The LWG needs to address these comments in further developing and applying the FS tools, in the alternatives development and screening process, and the detailed evaluation of alternatives in the Feasibility Study.

Please let us know if you have any questions regarding these matters please contact Chip Humphrey at (503) 326-2678. All legal inquiries should be directed to Lori Cora at (206) 553-1115.

Sincerely,

Chip Humphrey
Remedial Project Manager

cc: Greg Ulirsch, ATSDR
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